

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Thomas J. Tucker

**CERTIFICATION OF NO RESPONSE OR OBJECTION REGARDING CITY OF
DETROIT'S MOTION TO ENFORCE ORDER, PURSUANT TO SECTIONS 105, 501,
AND 503 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND
3003(c), ESTABLISHING BAR DATES FOR FILING PROOFS OF CLAIM AND
APPROVING FORM AND MANNER OF NOTICE THEREOF AGAINST
ANTOINETTE CUNNINGHAM AND WILLIE MAE HALL [Doc No. 10177]**

On September 4, 2015, the City Of Detroit ("City") filed its Motion to Enforce Order, Pursuant to Sections 105, 501, and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing of Proofs of Claim and Approving Form and Manner of Notice Thereof against Antoinette Cunningham and Willie Mae Hall ("Motion"). [Doc. No. 10177]. The Motion was served via first class mail and electronic mail upon counsel for Antoinette Cunningham and Willie Mae Hall on the same date. *See Certificate of Service Exhibit A.*

No response or objection to the Motion was filed with the Court and the time to do so has passed. The City respectfully requests that the Court enter an order in substantially the same form as the one which was attached to the Motion. *See Proposed Order Exhibit B.*

Respectfully submitted,

By: /s/ Marc N. Swanson

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ATTORNEYS FOR THE CITY OF DETROIT

DATED: September 23, 2015

Exhibit A

EXHIBIT 4 – CERTIFICATE OF SERVICE

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846
Honorable Thomas J. Tucker
Chapter 9

The undersigned hereby certifies that on September 4, 2015, the foregoing ***CITY OF DETROIT'S MOTION TO ENFORCE ORDER, PURSUANT TO SECTIONS 105, 501, AND 503 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND 3003(c), ESTABLISHING BAR DATES FOR FILING PROOFS OF CLAIM AND APPROVING FORM AND MANNER OF NOTICE THEREOF AGAINST ANTOINETTE CUNNINGHAM AND WILLIE MAE HALL*** was filed and served via the Court's electronic case filing and notice system and served via first class mail and email upon counsel to the Plaintiffs:

Kevin W. Geer, Esq.
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DATED: September 4, 2015

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Exhibit B

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**ORDER GRANTING CITY OF DETROIT’S MOTION TO ENFORCE ORDER,
PURSUANT TO SECTIONS 105, 501, AND 503 OF THE BANKRUPTCY CODE AND
BANKRUPTCY RULES 2002 AND 3003(c), ESTABLISHING BAR DATES FOR FILING
PROOFS OF CLAIM AND APPROVING FORM AND MANNER OF NOTICE
THEREOF AGAINST ANTOINETTE CUNNINGHAM AND WILLIE MAE HALL**

This matter, having come before the Court on the Motion to Enforce Order, Pursuant to Sections 105, 501, and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing of Proofs of Claim and Approving Form and Manner of Notice Thereof against Antoinette Cunningham and Willie Mae Hall (“Motion”), upon proper notice and a hearing, the Court being fully advised in the premises, and there being good cause to grant the relief requested,

THE COURT ORDERS THAT:

1. The Motion is granted.
2. Within five days of the entry of this Order, Antoinette Cunningham and Willie Mae Hall shall dismiss, or cause to be dismissed, with prejudice the action captioned as *Antoinette Cunningham and Willie Mae Hall, Plaintiffs, v. City of Detroit, Defendant*, filed in the Wayne County Circuit Court and assigned Case No. 14-011459 (“State Court Action”).
3. Antoinette Cunningham and Willie Mae Hall are both permanently barred, estopped and enjoined from asserting the claims arising from or related to the State Court Action against the City of Detroit or property of the City of Detroit.

4. Antoinette Cunningham and Willie Mae Hall are both prohibited from sharing in any distribution in this bankruptcy case.

5. The Court shall retain jurisdiction over any and all matters arising from the interpretation or implementation of this Order.